

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IAN L. LAND,
an individual,
Plaintiff,

Case No. 2:22-cv-12672-MFL-CI
Hon. Matthew F. Leitman

V

CITY OF DETROIT
a municipal corporation,

**PLAINTIFF'S RULE 26(a)(1)
DISCLOSURES**

RYAN RULOFF,
City of Detroit Police Officer,
Individually, and in his Official
Capacities, and

MATTHEW WEBB,
City of Detroit Police Officer,
Individually, and in his Official
Capacities, and

Defendants.

Plaintiff, IAN L. LAND, through his attorneys the Law Offices of Ivan L. Land, P.C., makes the following disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure:

- (A) The name and, if known, the address and phone number of each individual likely to have discoverable information relevant to disputed facts alleged

with particularity in the pleadings, identifying the subjects of the information.

DISCLOSURES:

- Ian Lamar Land will upon information and belief testify to the incident that occurred between him and the Defendant Officers; C/o Attorney Ivan L. Land 25900 Greenfield Rd., Suite 210 Oak Park, MI 48237; 248.968.4545;
 - Jyzelle Deese will upon information and belief testify to the incident that occurred between Plaintiff and the Defendant Officers; C/o Attorney Ivan L. Land 25900 Greenfield Rd., Suite 210 Oak Park, MI 48237; 248.968.4545;
 - Defendant Officer Ryan Ruloff will upon information and belief testify to the incident that occurred between Plaintiff and himself; the falsehoods that he documented in his reports, and the policies and procedures of their police department; address and phone number unknown; C/o defense counsel;
 - Defendant Officer Matthew Webb will upon information and belief testify to the incident that occurred between Plaintiff and himself; the falsehoods that he documented in his reports, and the policies and procedures of their police department; address and phone number unknown; C/o defense counsel;
 - Any and all agents/record custodian/keepers of any produced documents or electronic media tendered by either party;
 - Any and all individuals named in Defendants' Fed. R. Civ. P. 26(a)(1) disclosures and in all documents tendered by any party in this case.
- (B) A copy of, or description by category and location of, all documents, data compilations and tangible things in the possession, custody or control of the party that are relevant to disputed facts alleged with particularity in the pleadings:

DISCLOSURES:

- Surveillance Footage from the gas station (will provide by mail);
- Police Report (will provide by mail);
- 36th District Court Dismissal Documentation (will provide by mail)

The following documents are obtainable by subpoena to the appropriate governmental agency:

- Unknown; Plaintiff's investigation continues.

(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including material bearing on the nature and extent of injuries suffered.

DISCLOSURES:

Lost Wages:

*Age 31-40: \$12,600 Salary x 10 years = \$126,000.00

**Age 41-60: \$150,000 Salary x 20 years = \$3,000,000.00

Total: \$3,126,000.00 (does not include inflation and/or benefits)

Emotional Distress Damages, these damages are not easily ascertainable, and Plaintiff will leave it to a jury to determine.

Exemplary Damages, these damages are not easily ascertainable, and Plaintiff will leave it to a jury to determine.

(D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy

part of or all of a judgment, which may be entered in the action, or to indemnify or reimburse for payments made to satisfy judgment.

DISCLOSURES:

Plaintiff does not have any insurance to cover his losses suffered by Defendants' conduct.

Dated: January 17, 2023

Respectfully submitted,

/s/Ivan L. Land

Ivan L. Land (P65879)

Law Offices of Ivan L. Land, P.C.

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I certify that I have caused true and correct copies of **PLAINTIFF'S RULE 26(a)(1) Initial Disclosures**, to be sent via E-mail to the attorney of record, Philip Hiltner (hiltnerp@detroitmi.gov).

Dated: January 17, 2023

Respectfully submitted,

/s/Ivan L. Land

Ivan L. Land